## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

PRINCIPAL LIFE INSURANCE COMPANY	) ) )
Plaintiff,	) No. 08 C 491
v.	) ) Index Leftrons
ROSANNE HAMEL	) Judge Lefkow ) Magistrate Judge Ashman
Defendant.	)
	)

## AGREED MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER OR OTHERWISE PLEAD

Defendant, Rosanne Hamel, moves this Honorable Court, pursuant to Fed. R. Civ. P. Rule 6(b)(1), for an enlargement of time within which to file an answer to the complaint or otherwise plead. In support of this motion, Defendant states as follows:

- 1. Defendant was served summons in New York on May 14, 2008.
- Defendant's answer to Plaintiff's complaint is due 20 days after service,
   June 3, 2008.
- 3. Despite due diligence, counsel will be unable to complete the answer by that date due to the below described circumstances.
- 4. Defendant retained Mark D. DeBofsky and Violet H. Borowski of Daley, DeBofsky & Bryant as counsel on June 3, 2008.
- 5. In order to accurately respond to the allegations in Plaintiff's complaint,
  Defendant requires a copy of the Plan. Defendant contacted Plaintiff's counsel, Julie Line

Bailey, on June 3, 2008 to request that she send us a complete copy of the Plan at issue, and

Plaintiff agreed.

6. Defendant respectfully requests that she be given an additional 30 days

through July 3, 2008, in which to submit an answer or otherwise plead.

5. Defendant contacted Plaintiff's counsel on June 3, 2008 and Plaintiff has no

objection to this request.

WHEREFORE, Defendant respectfully requests that this court grant Defendant's

motion for an extension through July 3, 2008.

Dated: June 5, 2008

<u>s/ Mark D. DeBofsky</u>

Mark D. DeBofsky Attorney for Defendant

Daley, DeBofsky & Bryant 55 W. Monroe St., Suite 2440 Chicago, IL 60603 (312) 372-5200 FAX (312) 372-2778

## **CERTIFICATE OF SERVICE**

TO: Julie Line Bailey
Gibson & Sharps
745 McClintock Drive, Suite 227
Burr Ridge, Illinois 60527

The undersigned attorney hereby certifies that on June 5, 2008, he electronically filed the foregoing motion with the Clerk of the Court using the CMF/ECF filing system, which sent notice of such filing to the above named attorney.

DALEY, DE BOFSKY & BRYANT 55 W. Monroe St., Suite 2440 Chicago, Illinois 60603 (312) 372-5200 FAX (312) 372-2778

<u>s/ Mark D. DeBofsky</u>Attorney for Defendant Rosanne Hamel